

SUMMARY OF THE QUALITY SYSTEMS COMMITTEE TELECONFERENCE OCTOBER 6, 1998

The Quality Systems Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on October 6, 1998, at 9 a.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Mr. Joe Slayton of the U.S. Environmental Protection Agency (EPA) Region III. A list of action items is given in Attachment A. A list of participants is given in Attachment B. Issues to be addressed are listed in Attachment C. Changes recommended for the Quality Systems (QS) Chapter at this teleconference are contained in revision 9.04 (5qs_9-04.wpd). *The purpose of the meeting was to: review action items from the previous meeting, review comments received to date on Chapter 5, and identify action items for the next meeting.*

QS COMMITTEE MEETING IN ANNAPOLIS

The QS Committee will meet in Annapolis, MD on November 8, 9, and 10, 1998. Portions of the meeting will be open to the public on November 9 and 10. The proposed meeting times are listed below. These times are flexible.

- November 8, 10 a.m. to 5 p.m. Eastern Standard Time (EST)
- November 9, 9 a.m. to 5 p.m. EST
- November 10, 10 a.m. to 2 p.m. EST

Mr. Slayton is preparing a draft agenda for this meeting. The topics to be considered include:

- calibration and detection (tentatively scheduled for November 8 and the morning of November 9),
- QS Committee administrative items (tentatively scheduled for November 8),
- addressing comments on the QS Chapter (tentatively scheduled for the afternoon of November 9 and November 10).

This meeting is also an opportunity to get input from the Environmental Monitoring Management Council (EMMC) during the November 9 session.

QS COMMITTEE MEMBERSHIP

Ms. Sheila Myers and Mr. Donovan Porterfield will rotate off the committee in 1999 while Mr. Slayton and Ms. Mary Bruch will rotate off in 2000.

FREQUENTLY ASKED QUESTIONS PARKING LOT

The committee agreed that the issues Mr. Slayton identified in his e-mail of September 22, 1998 to the committee (these items are listed in Attachment C, Item 1, Request from NELAC: Frequently Asked Questions) are a good starting point for items to go on the NELAC World Wide Web site.

Comments on Chapter 5

Mr. Slayton proposes to divide among the committee participants responsibility for reviewing and drafting responses to the comments listed as C1 through C15 in Attachment C, Item 2 and those comments and issues listed in Item 3. The committee will then discuss the responses to comments at future meetings. Refer to Attachment C, Items 2 and 3 for the committee participants assigned to each comment.

Comments from Water Environment Federation

The Committee continued addressing comments received from the Water Environment Federation dated April 19, 1998.

| Section of QS Chapter to Which Comment Applies | QS Committee Response to Comment |
|--|--|
| 5.12.3.1.f | Section 5.12.3 was intended to be a consolidated list of records that need to be kept. To clarify the purpose of 5.12.3.1, .2, .3, and .4, the committee will cross-reference the listed items with sections of the chapter where the record keeping requirements are detailed. Also, an introductory paragraph will be drafted for Section 5.12.3 that clarifies the purpose of this section. In addition, the committee will consider consolidating and listing the records to be kept in a separate appendix and cross referencing this list with the record keeping requirements in the chapter. |
| 5.12.3.1.i | Response to 5.12.3.1.f addresses this comment. |
| 5.12.3.1.n (cited as 5.12.3.1.o in comment) | This requirement may have been deleted from the chapter. This will be verified when this section is cross-referenced. |
| 5.12.3.3.e | This comment was previously addressed by adding “manual” to clarify the meaning of this sentence |
| 5.12.4.1 | Section 5.12.4 states that this section applies to legal or evidentiary custody and not non-evidentiary samples. |
| D.1.4.d (cited as D.4.1.d in comment) | The issue of Method Detection Limit (MDL) was addressed by language added during the NELAC IV conference. |
| D.3.c | D.3.c will be deleted from the chapter. It is redundant with the requirements in D.3.b |
| D.3.1.a.2 (Cited as D.1.a.2 in comment) | This item is part of essential QC requirements even though not all methods require it. |

| Section of QS Chapter to Which Comment Applies | QS Committee Response to Comment |
|--|---|
| D.3.1.b | The response to this comment is the same as for D.3.1.a.2. However, the committee will consider changing the monthly positive control requirement to quarterly. |
| D.3.2.a | Section left as written, multiple dilutions for a single analyses does not count as a duplicate. |
| D.3.6.f | The committee will consider allowing manufacturer documentation of non-inhibition in lieu of performing a check such as an inhibitory residue test. |

Status of Air Monitoring Requirements

Mr. Clifford Glowacki plans to distribute the current draft of the air monitoring standards at the end of the week. Where possible, requirements for air monitoring will be incorporated into chapter. Issues specific to air monitoring will be addressed separately in an appendix. The committee plans to add discussion of the air monitoring draft to the agenda for the Annapolis meeting on November 10, 1998.

NEXT MEETING

The next meeting of the Quality Systems Committee is scheduled for October 19, 1998 from 1 p.m. to 3 p.m. EDT. The telephone number is 202-260-1015, access code 8958#.

Additional meetings are scheduled as follows:

- November 2, 1998 from 1 p.m. to 3 p.m. EST.

ACTION ITEMS
QUALITY SYSTEMS COMMITTEE
OCTOBER 6, 1998

| Item No. | Action Item | Date to be Completed |
|-----------------|---|---------------------------------|
| 1. | Next QS Committee teleconference. | October 19, 1998 1 p.m. EDT |
| 2. | Mr. Slayton to distribute the phone number for the conference room and teleconference number for the Annapolis meeting on November 8 th through the 10 th . | October 6, 1998 |
| 3. | Mr. Slayton to notify Ms. Carolyn Cross of the QS Committee participants rotating off the committee in 1999 and 2000. | October 6, 1998 |
| 4. | Mr. Slayton to assign responsibility to QS Committee participants for reviewing and addressing comments listed in Attachment C, Items 2 and 3. | October 6, 1998 |
| 5. | QS Committee participants to review and draft responses to assigned comments from list in Attachment C, Items 2 and 3. | By October 19th teleconference. |
| 6. | QS Committee participants to cross reference list of items in Sections 5.12.3.1 through 3.4 with requirements in the chapter. | |
| 7. | Mr. Porterfield to draft introductory paragraph for Section 5.12.3. | |
| 8. | Consider changing the requirement for monthly positive controls to quarterly in Section D.3.1.b | |
| 9. | Consider allowing manufacturer documentation of non-inhibition in lieu of performing a check such as an inhibitory residue test | |
| 10. | Mr. Glowacki to distribute draft of air monitoring standards. | October 9, 1998 |

**PARTICIPANTS
QUALITY SYSTEMS COMMITTEE
OCTOBER 6, 1998**

| Name | Affiliation | Phone Numbers |
|--|--|---|
| Mr. Joe Slayton | USEPA, Region III, OASQA | T: 410-573-2653 F: 410-573-2698 E: slayton.joe@epamail.epa.gov |
| Ms. Mary K. Bruch (Absent) | Mary Bruch Micro Reg. Inc. | T: 703- 589-1514 F: 703- 779-0267 E: |
| Mr. Raymond J. Frederici (Absent) | Recra Labnet - Chicago | T: 708-534-5200 F: 708-534-5211 E: frederir@recra.com |
| Mr. Clifford R. Glowacki | Ashland Chemical Company | T: 614-790-3482 F: 614-790-4294 E: cglowacki@ashland.com |
| Ms. Sylvia S. Labie | Florida Department of Environmental Protection | T: 904-488-2796 F: 904-922-4614 E: labie_s@dep.state.fl.us |
| Mr. David Mendenhall | Utah Department of Health | T: 801-584-8470 F: 801-584-8501 E: dmendenh@doh.state.ut.us |
| Ms. Sheila Meyers | Texas Natural Resource Conservation Commission | T: 512-239-0425 F: 512-239-6307 E: smeyers@tnrcc.state.tx.us |
| Mr. Jeff Nielson (Absent) | City of Tallahassee Water Quality Division | T: 850-891-1232 F: 850-891-1062 E: nielsenj@mail.ci.tlh.fl.us |
| Mr. Donovan R. Porterfield | Los Alamos National Laboratory | T: 505-667-4710 F: 505-665-5982 E: dporterfield@lani.gov |
| Mr. Scott D. Siders | Illinois Environmental Protection Agency | T: 217-785-5163 F: 217-524-0944 E: epa6113@epa.state.il.us |
| Dr. Fred Siegelman | US EPA, QAD | T: 202-564-5173 F: 202-564-2441 E: siegelman.frederic@epamail.epa.gov |
| Mr. Mike Cross (Contractor Support) | Research Triangle Institute | T: 202-728-2045 F: 202-728-2095 E: myc@rti.org |

PARKING LOT ISSUES/ITEMS

1. Request from NELAC: Frequently Asked Questions

From: Irene E Ronning <Irene_E_RONNING@ohdmail.hr.state.or.us>
To: R3MD1.R3CRL(SLAYTON-JOE),R3HUB.IN("arhyne@tnrcc.st...
Date: 9/21/98 7:13pm
Subject: NELAC:FAQs

TO: All NELAC Committee Chairs
FROM: Irene Ronning, M&O Committee Chair

The Membership and Outreach Committee is working to put together a Frequently-Asked-Questions (FAQ) section on the NELAC Website. If your committee receives such questions, please pass them on to me so we can put them on the Site so you won't have to keep answering them.

Please consider this an open request. That is, any time a new question becomes popular, please pass them on to us.

My e-mail: Irene.E.Ronning@state.or.us
FAX: (503) 229-5682
Address: Oregon State Public Health Lab, 1717 SW 10th Ave, Portland,
OR 97301

From: JOE SLAYTON
To: qs
Date: 9/22/98 4:48pm
Subject: NELAC:FAQs -Forwarded

See attached request for items: Maybe this is a good spot for not only freq. asked questions, but those areas we need to clarify or emphasis:

like...

If a mandated method (required by EPA or state) are less stringent than the QS standards what do I follow?

Ans. the most restrictive/demanding.

Do the QS standards require the use of any specific method? Do the QS standards allow for the use of the PBMS approach?

Ans. No. Ans. Yes, but the QS standards may well include additional QC checks (considered by NELAC to be essential) than those associated with a PBMS method for a given project.

PARKING LOT ISSUES/ITEMS (CONTINUED)**2. Comments to Chapter 5 Standards Received Since or at NELAC**

From: JOE SLAYTON
 To: R3HUB.in."dmendenh@doh.state.ut.us", R3HUB.in."ron...
 Date: 7/18/98 11:55pm
 Subject: Chapter, Comments, homework, plans, etc.

I have received a number of comments on the chapter. Some at the conference in Texas and some from Silkie--apparently too late for discussion at the last conference. I will be fed Xing early next week the comments from:

| <u>Comment Number</u> | <u>Commenter</u> | <u>QS Committe Participant Addressing Comment</u> |
|-----------------------|--|---|
| C1 | Mary Boatman (Texas TNRCC) | Mr. Slayton |
| C2 | Aquatech | Ms. Bruch |
| C3 | Water Envir. Federation | Addressed |
| C4 | Eastman Chemical Co. (Texas Div.) | Mr. Frederici |
| C5 | Carl Kircher (?) | Mr. Glowacki |
| C5B | Suburban Water Testing Lab | Addressed |
| C6 | Quanterra | Mr. Mendenhall |
| C7 | Castaic Lake Water Agency | Ms. Myers |
| C8 | Bruce De Grazia (Assist. Deputy Under Secretary of Defense) | Mr. Nielson |
| C9 | David Brymer, TNRCC | Mr. Porterfield |
| C10 | Silky Labie | Mr. Siders |
| C11 | Barbara Hill (Waste Management) | Dr. Siegelman |
| C12 | Jackie Saple | Mr. Slayton |
| C13 | J.R. Hall (?) | Ms. Bruch |
| C14 | Kodak | Mr. Frederici |
| C15 | Carl Kircher (2nd set of comments) | Mr. Glowacki |

Mr Slayton will address comments contained in an October 5, 1998 Email from Ms. Cindy Dingman and Mr. Thomas McAinch (Eastman).

3. Action Items From NELAC IV (From Action Item Table From "Summary of the QS Committee Meeting June 29-30, 1998" by RTI as Well as Additional Items from the Narrative of the Meeting Summary. Compiled by Mr. Slayton And Circulated to QS 8/23/98)

From the Summary of the QS Committee Meeting (June 29-June 30, 1998) NELAC IV 8/23/98 "leftoff.wpd"

PARKING LOT ISSUES/ITEMS (CONTINUED)

From the Narrative:

Section 5.10.2.1.d. Method Validation. Need to work on per matrix/media, etc. and related topic Appendix C.1.b-Definition of Medium/matrix. **(Mr. Mendenhall)**

Section 5.9.4.3.d Instrument Calibration. To be addressed in detail. **(Continue as group effort)**

Appendix D.1.4.c. Method Detection Limit and Definition Limit of Detection. It was decided to leave it in as is and clarify it over the next year. **(Continue as group effort)**

Appendix D.5. Air Testing. (Subcommittee Cliff Glowacki, Susan Kilmer, Mike Poore, Gene Riley, Don Russel, and Hank Taylor). Four sections to review in detail. **(Mr. Glowacki is the point of contact)**

From the table at the end:

1. Committee to read glossary definitions of “medium” in order to decide wording changes (substitution of “medium” for “matrix”) for Section 5.10.2.1. **(Mr. Mendenhall)**
2. Committee to decide if there is a need to exempt preservation checks in certain circumstances and to identify specific standards if required (Section 5.11.3). **(Ms. Myers)**
3. Committee to consider substituting “level of detection” for “limit of detection” in appendix B (Definitions). **(Continue as group effort)**
4. Committee to consider clarification of language in D.1.1 concerning blank contamination levels which are lower than method detection limit. **(Mr. Nielson)**
5. Committee to determine whether quantitatively reported result values above the regulatory level should be bracketed by standards. **(Mr. Porterfield)**
6. Committee to consider the alternatives to the current MDL requirements and propose changes. **(Continue as a group effort)**
7. Committee to consider other approaches to calibration, and the merits of single point calibration curves and propose changes. **(Continue as a group effort)**
8. Committee to reconsider the time frame for spiking all components of a multi component method. **(Mr. Siders)**
9. Input form the Air Subcommittee must be completed. **(As above)**
10. Incorporation of Air Subcommittee recommendation. **(As above)**
11. Response to Suburban Water Testing Laboratory, Inc. Letter. **(Addressed)**

PARKING LOT ISSUES/ITEMS (CONTINUED)

12. Consider comments received from April 15 through July 2, 1998. **(To be addressed as indicated in Item 2)**

4. Rotation of QS Committee Members Off of the Committee

From: CAROLYN CROSS
To: R3MD1.R3CRL.SLAYTON-JOE
Date: 9/18/98 7:45am
Subject: QS Membership

Joe,

After reviewing your membership list and the dates of rotation, I just wanted to remind you that you, your committee, or the people themselves must decide who will rotate off in 1999. For Voting Members, either you or Sheila Meyers will have to rotate off and for Contributors, either Donovan Porterfield or Mary Bruch, will have to rotate off. We know that the 5-year term may not be up but as it was set up in the beginning some members must rotate off before their full terms are up. (See attachment on membership policy, item 11). Please let me know asap the names of the voting member and contributor that will rotate off in 1999. Thanks.

**Policy on
Committee Membership
File: policy5.wpd:**

NELAC will benefit if committee membership presents the greatest possible input from both the private sector and the government participants. It is in the best interests of all to expand the base of information and perspectives. The following procedures are designed to assure that the selection process for new committee members and contributors is uniform across committees and reflects the desire to incorporate as many different perspectives as possible.

1. Nomination forms for committee participation will be available on the Bulletin Board Service (BBS) and will be provided at all NELAC Annual and Interim Meetings. Completed forms will be distributed to the appropriate committee chairs. It is highly recommended, but not mandatory, to have a nomination form for each potential committee participant.
2. The committee chair is responsible for initiating the selection process and requesting the NELAC Chair to appoint all members and contributors.
3. The committee chair is to attempt to balance the voting membership to the degree possible, taking the following into consideration:
Voting Members
 - no concurrent members from the same state, federal agency, or EPA Office/Region;
 - type of state/federal program, e.g., drinking water only, comprehensive program covering water, waste, air, etc.;
 - size of state; and
 - geographic distribution.

PARKING LOT ISSUES/ITEMS (CONTINUED)

4. The committee chair should select contributors based on their particular merits, experience, knowledge, etc. of the individual. In no way should the combination of contributors be used to develop consensus advice. Any individual may be solicited to provide advice and comments. Consensus advice can only be solicited through the Environmental Laboratory Advisory Board, chartered under the Federal Advisory Committee Act (FACA). The chair should consider the following factors when seeking Contributors for input to the committee:
Contributors*
 - no concurrent contributors from the same company or organization;
 - affiliation, e.g. laboratory, local government, industry, etc.
 - size of organization; and
 - geographic distribution.
5. To the extent possible the committee chair shall select individuals from different agencies or organizations than those represented on the other committees. The NELAC Chair, upon reviewing the nominations from all committees, will make a judgement on the appropriateness of the selections on an overall basis.
6. When an individual resigns during his or her term of office, the committee chair may nominate another individual from the same organization as a replacement for the duration of the term.
7. Nominees for the routine rotational appointments should be selected from organizations or agencies other than those represented by the exiting voting member or contributor.
8. Any voting member or contributor who has served on a committee shall be eligible to serve on another committee once he or she has resigned from the committee or completed his or her term on the committee.
9. A written request must be submitted to the Board of Directors for any exceptions to these guidelines.
10. Board members will not serve concurrently on a committee. (An exception to this guideline will be granted during the first 5 years of operation of NELAC for the Program Policy and Structure Committee only.) Board members will be requested to contact each of the committees to serve as liaison between the Board and the committee.
11. During the first five years of NELAC's operation the standing committee membership shall be staggered. Since all members' terms started on the same date, it is necessary that some committee members serve less than a full term. At least one contributor and one voting member must rotate off the committee each year.
12. During the first three years of NELAC's operation the administrative committee membership, other than the Nominating Committee, shall be staggered. Since all members' terms started on the same date, it is necessary that some committee members serve less than a full term. At the end of the second year, a total of three contributor and three voting members must rotate off the committee, with a minimum of one contributor and one voting member in any one year.
13. These staggered rotations may be accomplished by natural attrition due to resignation of one or more individuals, by requesting volunteers to rotate off the committee, or any other method that the chair deems equitable.